

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

ENCOMPASS INSURANCE COMPANY,

CIVIL DIVISION

No. 2:17-cv-00125-AJS

Plaintiff,

v.

STONE MANSION RESTAURANT,
INCORPORATED,

Defendant.

MOTION FOR REMAND

Plaintiff, Encompass Insurance Company, by and through its attorneys, and pursuant to 28 U.S.C. 1447(c), files this Motion for Remand. Defendant moves for remand based on 28 U.S.C. §§ 1441, 1446, and 1447, the federal case law, and the agreement of counsel with respect to service. A Memorandum of Law in Support of this Motion has been filed contemporaneously with this Motion and is incorporated by reference as if fully rewritten herein.

Respectfully Submitted,

ROBB LEONARD MULVIHILL LLP

Date: 1/30/2017

/s/ Joshua R. Guthridge
Joshua R. Guthridge, Esquire
*Counsel for Plaintiff Encompass Insurance
Company of America*